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WASHINGTON SQUARE, SUITE 1100 • 1050 CONNECTICUT AVENUE, N.W. • WASHINGTON, D.C. 20036-5304 • (202) 861-1500
FAX (202) 861-1783
WRITER'S DIRECT DIAL NUMBER

(202) 861-1580

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September 29, 2000

VIA MESSENGER

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

**Re: PETITION FOR RULEMAKING TO AMEND THE DTV TABLE OF
ALLOTMENTS**

Dear Ms. Salas:

On behalf of Channel 6, Inc., licensee of television station KCEN-TV, Temple, Texas, I am transmitting herewith an original and four (4) copies of a Petition for Rulemaking to Amend the DTV Table of Allotments. Specifically, KCEN petitions the Commission to allot Channel 9 as the DTV channel for KCEN-TV, in place of the current allotment of Channel 50. KCEN currently broadcasts on Channel 6.

Should there be any questions please do not hesitate to contact the undersigned.

Sincerely,

Kenneth C. Howard (Jr)
Kenneth C. Howard, Jr.

cc: Pam Blumenthal

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amendment of 47 C.F.R. § 73.622)
Digital Television Table of Allotments)
Station KCEN-DT, Temple, TX)

To: The Commission

Petition for Rulemaking To Amend the DTV Table of Allotments

1. Channel 6, Inc. ("KCEN"), licensee of television station KCEN-TV, Temple, Texas, and permittee of Station KCEN-DT, through counsel, hereby files this Petition for Rulemaking To Amend the DTV Table of Allotments, 47 C.F.R. § 73.622. Specifically, KCEN petitions the Commission to allot Channel 9 as the DTV channel for KCEN-TV, in place of the current allotment of Channel 50. KCEN-TV currently broadcasts on Channel 6.

2. As documented by the attached engineering study, KCEN's proposed channel change is in compliance with the Commission's rules and is specifically permissible under Section 73.623(c)(2), 47 C.F.R. § 73.623(c)(2). See Technical Exhibit prepared by Jeff Reynolds of du Treil, Lundin & Rackley, Inc., attached as Exhibit A.

3. Grant of this petition would serve the public interest because it permits comparable coverage of Station KCEN-DT's service area at a far lower cost. Utilizing VHF Channel 9 instead of UHF Channel 50 will dramatically reduce both the construction and operating costs for the station. Utilizing VHF facilities will result in the station saving hundreds of thousands of dollars in construction costs and will reduce electricity costs for the station by at least \$14,000 per month. These substantial savings are important to KCEN's ability to maintain

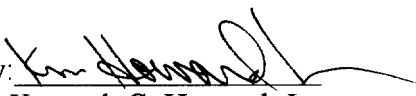
a high level of public interest programming. Like other broadcasters operating on the fringes of large markets, KCEN confronts the difficult economic reality that competition for its viewers' attention is increasing dramatically faster than its opportunities for enhancing station revenues. Taking advantage of these substantial potential economies is important to the continuation of Station KCEN's high level of public service.

5. Further, viewer identification of a VHF Channel 9 operation will be augmented by the fact that KCEN's analog and digital operations would be in the same frequency band.

6. Accordingly, KCEN requests that the Commission amend the DTV Table of Allotments to allot Channel 9 to KCEN-DT, Temple, Texas.

Respectfully submitted,

CHANNEL 6, INC.

By: 
Kenneth C. Howard, Jr.
Counsel

Baker & Hostetler LLP
Suite 1100
1050 Connecticut Ave., N.W.
Washington, D.C. 20036-5304
Telephone: (202) 861-1580

September 28, 2000

DECLARATION

I, Randy Odil, am the Vice-President and General Manager of Channel 6, Inc. I have read the attached Petition for Rulemaking to Amend the DTV Table of Allotments and declare under penalty of perjury that the statements of fact therein are true and correct to the best of my knowledge and belief.

Executed on Sept. 28, 2000


Randy Odil

EXHIBIT A

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF A
PETITION FOR RULE MAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION KCEN-TV
TEMPLE, TEXAS

Technical Summary

This technical narrative and associated exhibits have been prepared on behalf of KCEN-TV at Temple, Texas in support of a Petition for Rule Making to modify the DTV allotment of KCEN-TV from UHF channel 50 to VHF channel 9.

DTV channel 9 can be substituted and allotted to Temple, Texas in compliance with the principle community coverage requirements of Section 73.625(a) at reference coordinates Latitude 31°16'24", Longitude 97°13'14".¹ In addition, operation on DTV channel 9 appears possible with an effective radiated power (ERP) of up to 7.5 kW utilizing a nondirectional antenna and an antenna height above average terrain (HAAT) of 573 meters. The proposed channel change is acceptable under the 2 percent criterion for *de minimis* impact applicable to DTV allotment modifications under Section 73.623(c)(2). Therefore, it is proposed to modify KCEN-TV's authorization to specify operation on the alternate DTV channel with the following specifications:

State & City	DTV Channel	DTV ERP (kW)	Antenna HAAT (m)
TX, Temple	9	7.5	573

It is also proposed to amend the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, as follows:

¹ This is also the current DTV allotment reference point as well as the existing NTSC transmitter site for KCEN-TV.

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Temple, Texas	50	9

Station KCEN-TV is currently allotted UHF channel 50 for its DTV operation with an ERP of 1000 kW and an HAAT of 573 meters. In addition, KCEN-TV has a construction permit for DTV operation on channel 50 which specifies a nondirectional antenna maximum ERP of 1000 kW and an HAAT of 527 meters (BPCDT-20000223AAQ).

Station KCEN-TV proposes to allot VHF channel 9 at Latitude 31°16'24", Longitude 97°13'14". It is proposed to operate with an antenna radiation center height above mean sea level (RCAMSL) of 756 meters, an HAAT of 573 meters and a nondirectional antenna maximum ERP of 7.5 kW.

Figure 1 is a separation study for DTV channel 9 toward other NTSC and DTV allotments based on a 161 kilometer "buffer". Although the separation requirements are only applicable to new DTV allotments, they can be used as an indication of which stations have the potential of receiving interference from the proposed channel 9 DTV operation.

Figure 2 provides a summary of interference and service for the proposed channel 9 allotment. Determination of interference and service was based on the procedures outlined in OET Bulletin No. 69 and criteria contained in Sections 73.622 and 73.623 of the FCC's rules.² It is believed that the proposed channel 9 operation is in full compliance with the

² The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. **A nominal grid size resolution of 1 km was employed.** An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

FCC's 2%/10% interference criteria. In accordance with the FCC Public Notice released August 10, 1998 and entitled "Additional Application Processing Guidelines for Digital Television (DTV)", it is respectfully requested that the Commission review the proposal using a 1 kilometer cell size.

Figure 3 is a map which depicts the 36 dBu, F(50,90) noise limited contour for the proposed channel 9 DTV operation. Also shown are the city limits of Temple based on 1990 Census data. As indicated, all of Temple is located within the 36 dBu contour as currently required by FCC rules. Therefore, the proposed channel 9 DTV allotment will comply with the city coverage requirements contained in Section 73.625(a).

The FCC has proposed to modify the city coverage requirement from the 36 dBu, F(50,90) contour to the 57 dBu, F(50, 90) contour in MM Docket No. 00-39 (Review of the Commission's Rules and Policies Affecting the Conversion of Digital Television). The 57 dBu, F(50,90) contour for the proposed channel 9 DTV operation is depicted on Figure 3 and, as shown, all of Temple is located within the 57 dBu contour. Therefore, the proposed channel 9 DTV allotment will comply with the FCC's proposed city coverage requirements contained in MM Docket No. 00-39.

Studies indicate that the proposed channel 9 operation will not adversely impact any LPTV stations which filed for Class A eligibility.

As the community of Temple, Texas is located 415.6 kilometers from the closest point of the U.S.-Mexican border, coordination of the proposal with Mexico is not believed necessary.

Conclusion

VHF channel 9 can be substituted for the current UHF DTV channel 50 allotment of KCEN-TV in compliance with the FCC's rules concerning DTV allotment changes.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

September 26, 2000

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF A
PETITION FOR RULE MAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION KCEN-TV
TEMPLE, TEXAS

DTV to NTSC Separation Study

Job Title : Proposed DTV Ch. 9
Zone : 2
Channel 9 (186-192 MHz)

Separation Buffer 161 km
FCC TV DB Date : 09/25/00
Coordinates : 31-16-24 97-13-14

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WFAA-T LIC	DALLAS TX BLCT	-19900615	8(o) II	316 512	32-35-06 96-58-41	8.9	147.25 22.25	11.0/125 CLEAR
KLRN APP	SAN ANTONIO TX BPRM	-20000414	8 III	8.3 263	29-19-38 98-21-17	207.0	241.76 116.76	11.0/125 CLEAR
KUHT LIC	HOUSTON TX BLET	-19830325	* 8(-) III	316 564	29-34-28 95-29-37	138.3	251.00 126.00	11.0/125 CLEAR
KLST LIC	SAN ANGELO TX BLCT	-19811028	8(+) II	316 442	31-22-01 100-02-48	273.0	269.22 144.22	11.0/125 CLEAR
KTRE LIC	LUFKIN TX BLCT	-19851025	9(o) III	158 204	31-25-09 94-48-02	85.3	230.86 -42.74	273.6 SHORT
KLRN LIC	SAN ANTONIO TX BLET	-19840417	* 9(-) III	302 283	29-19-33 98-21-25	207.0	242.00 -31.60	273.6 SHORT
KRBC-T LIC	ABILENE TX BLCT	-1577	9(+) II	316 259	32-17-13 99-44-20	296.0	263.70 -9.90	273.6 SHORT
KWTX-T LIC	WACO TX BLCT	-19790730	10(+) II	209 552	31-19-19 97-19-02	300.5	10.68 0.32	11.0/125 CLOSE
KLTV-T APP	TYLER TX BPRM	-20000731	10 II	7.5 302	32-32-23 95-13-12	52.8	235.65 110.65	11.0/125 CLEAR
KLTV APP	TYLER TX BMPCDT	-20000501	10 II	15 302	32-32-23 95-13-12	52.8	235.65 110.65	11.0/125 CLEAR

** End of TV Separation Study for Channel 9 **

TECHNICAL EXHIBIT
 PREPARED IN SUPPORT OF A
 PETITION FOR RULE MAKING TO
 MODIFY THE DTV ALLOTMENT TABLE
 STATION KCEN-TV
 TEMPLE, TEXAS

Interference and Service Summary

I. Interference Caused

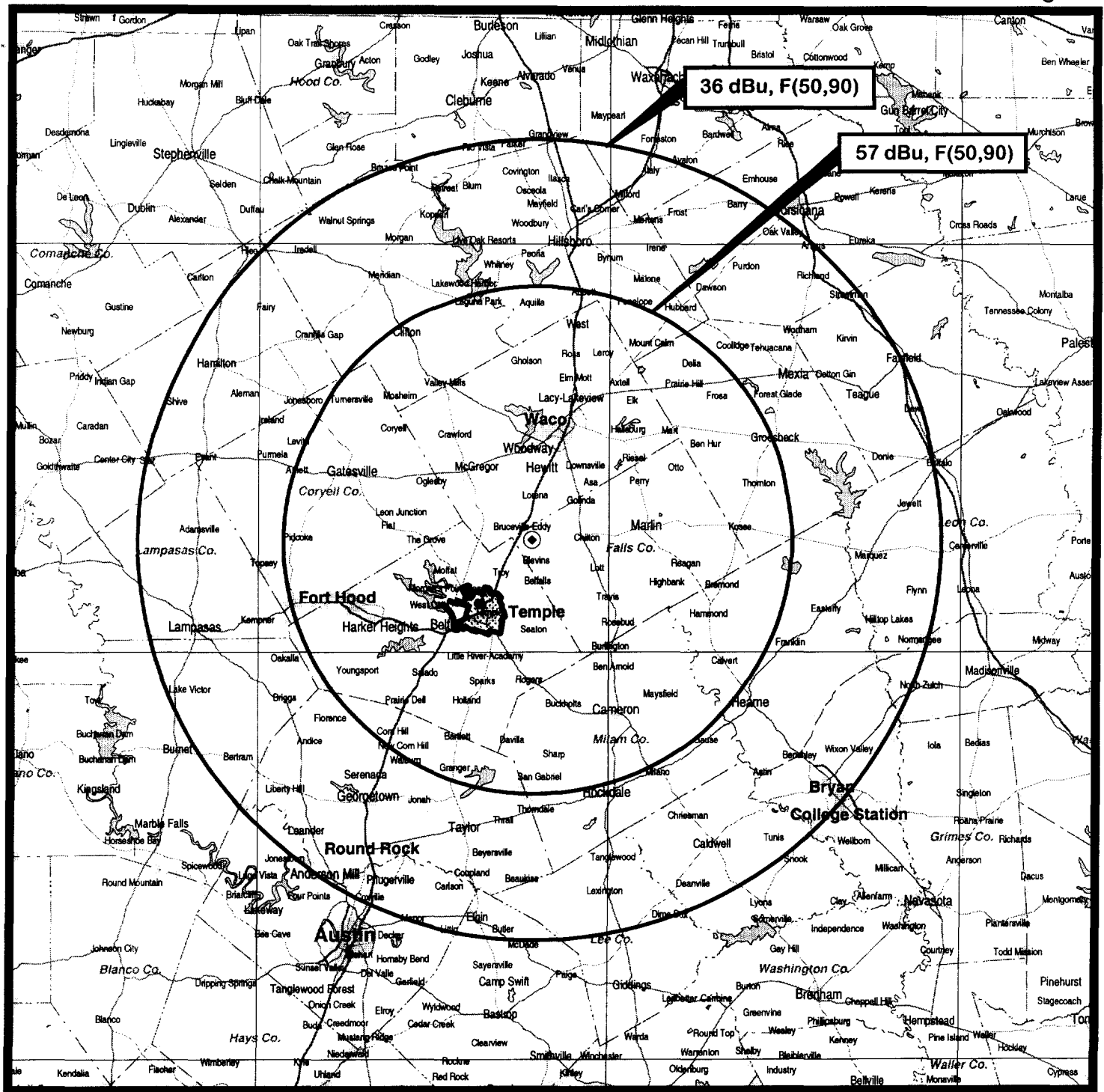
Protected NTSC/DTV Station	FCC Service Population	Current Interference	Proposed Interference Population	Unique Interference Population*
WFAA-TV, NTSC Ch. 8 Dallas, TX	4,232,780	0.0%	10,305 (0.24%)	--
WFAA-DT, DTV Ch. 9 Dallas, TX				
Allotment	4,202,000	0.0%	76,789 (1.83%)	--
License (BLCDT-19981103KG)	4,202,000	--	80,118 (1.91%)	--
KTRE-TV, NTSC Ch. 9 Lufkin, TX	224,473	5.0%	--	2,940 (1.3%)
KLRN-TV, NTSC Ch. 9 San Antonio, TX	1,524,417	0.3%	14,207 (0.93%)	--
KUHT-DT, DTV Ch. 9 Houston, TX				
Allotment	3,852,000	0.0%	6,019 (0.16%)	--
CP (BPEDT-19990113KF)	3,852,000	--	4,093 (0.11%)	--
KRBC-TV, NTSC Ch. 9 Abilene, TX	224,003	3.3%	1,150 (0.51%)	

*Considers interference "masking" from other NTSC and DTV assignments.

II. Service

	Population
Within Noise Limited Contour	899,484
Not Affected by Terrain Losses	885,563
Lost to NTSC Interference	29,588
Lost to DTV Interference	90,828
Total Service	765,147

Figure 3



PREDICTED COVERAGE CONTOURS

PROPOSED KCEN-DT
 TEMPLE, TEXAS
 CH 9 7.5 KW 573 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida